

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PENNSYLVANIA STATE  
CONFERENCE OF THE NAACP, *et al.*,

*Plaintiffs,*

v.

AL SCHMIDT, in his official capacity as  
Acting Secretary of the Commonwealth,  
*et al.*,

*Defendants.*

Case No. 1:22-cv-00339-SPB

**MOTION TO WITHDRAW ATTORNEY  
THOMAS R. SHAFFER AS COUNSEL FOR  
DEFENDANT, POTTER COUNTY  
BOARD OF ELECTIONS**

Movant, Attorney Thomas R. Shaffer, hereby submits this Motion to Withdraw as Counsel for Defendant, Potter County Board of Elections in this matter pursuant to L.R. 83.2 C.4, and in support thereof states as follows:

1. Movant, Attorney Thomas R. Shaffer was not appointed as a solicitor or an assistant solicitor for the Defendant, Potter County Board of Elections for calendar year 2025.

2. The County of Potter and the Defendant, Potter County Board of Elections appointed Stephanie L. Fere, Esq, Gabriel Fere, PC, 1010 Western Avenue, Suite 200, Pittsburgh, PA 15233 (Email: [sfera@gabrielfera.com](mailto:sfera@gabrielfera.com) - Supreme Court No 314392) as its new solicitor for who is responsible for providing representation to the Defendant so Defendant will suffer no adverse effect from the withdrawal of Attorney Shaffer's appearance.

3. WHEREFORE, Thomas Shaffer respectfully requests this Court to enter an order granting this motion and permitting him to withdraw from this action as counsel of record for Defendant.

Dated: January 3, 2025

Respectfully submitted,

/s/ Thomas Shaffer

Thomas R. Shaffer

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Coudersport, PA 16915

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Supreme Court No 37503

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of this document via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

Dated: October 22, 2024

Respectfully submitted,

/s/ Casey Smith

Casey Smith

ACLU FOUNDATION

125 Broad Street, 18th Floor

New York, New York 10004